

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JENNIFER L. BRODSKY,)	
)	
Plaintiff,)	
)	
v.)	No. 08 C 2955
)	
UNIFUND CCR PARTNERS, a purported)	Judge Leinenweber
New York General partnership, and)	
ARTHUR B. ADLER & ASSOCIATES,)	Magistrate Judge Schenkier
LTD., an Illinois Corporation,)	
)	
Defendants.)	

**DEFENDANTS' "UNOPPOSED" MOTION FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFF'S COMPLAINT**

Defendants, Unifund CCR Partners and Arthur B. Adler & Associates, Ltd., by and through their counsel, Joseph P. Kincaid and Kathleen A. Kelley, in response to Plaintiff's Complaint, respectfully request that this Honorable Court grant the Defendants additional time – twenty-one (21) days, until and including Thursday, July 10, 2008 – to answer or otherwise respond to Plaintiff Brodsky's Complaint. In support of this Unopposed Motion, Defendants state as follows:

1. On May 21, 2008, Plaintiff Brodsky filed his Complaint.
2. According to the online court docket, Defendant Unifund CCR Partners was served on May 30, 2008 and its answer is due June 19, 2008.
3. According to the online court docket, Defendant Arthur B. Adler & Associates, Ltd., was served on June 10, 2008, and its answer is due June 30, 2008.
4. On Monday, June 16, 2008, Defendants retained the aforementioned counsel in this matter. Counsel Joseph P. Kincaid and Kathleen A. Kelley filed Appearances concurrently

with this Motion.

5. On Wednesday, June 18, 2008, counsel from Swanson, Martin & Bell, LLP corresponded with Plaintiff's counsel, in which Plaintiff's counsel stated that he had no objection to this request for an extension of time.

6. In order to have the opportunity to properly defend and/or respond to Plaintiff Brodsky's Complaint, Defendants respectfully request additional time to respond to Plaintiff's complaint.

WHEREFORE, Defendants, Unifund CCR Partners and Arthur B. Adler & Associates, Ltd., respectfully request that this court enter an order granting the Defendants an extension of time – until and including Thursday, July 10, 2008 – to answer or otherwise respond to Plaintiff Brodsky's Complaint.

Respectfully submitted,

SWANSON, MARTIN & BELL LLP

/s/ Kathleen A. Kelley
One of the Attorneys for Defendants

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